

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIE CHRISTINE FANYO-PATCHOU,

Defendant.

CASE NO. CR19-0146-JCC

SUPPLEMENTAL CITATION TO
AUTHORITY

COME NOW the defendants, Marie Christine Fanyo-Patchou, Rodrigue Fodjo Kamdem, and Christian Fredy Djoko, by and through their attorneys, and submit the following supplemental authority related to their *Reply Regarding Unconstitutionality of 18 U.S.C. § 2261A(2)(B)*, Dkt. No. 181, and the citation to *United States v. Sineneng-Smith*, 910 F.3d 461 (9th Cir. 2018), *cert. granted* 140 S. Ct. 36, 204 L. Ed. 2d 1194 (2019), at pp. 17-18, 29:

1. *United States v. Sineneng-Smith*, ___ U.S. ___, No. 19-67 (5/7/20) (vacating Ninth Circuit because it abused its discretion by its invitation to amici to raise an overbreadth argument not raised by the appellant, and not reaching the overbreadth argument itself).

1 DATED this 7th day of May 2020.

2 Respectfully submitted,

3 s/ Gregory Geist

4 s/ Ann Wagner

5 s/ Jennifer E. Wellman

6 Attorneys for Mr. Djoko

s/ Neil M. Fox

s/ Michael P. Iaria

Attorneys for Ms. Fanyo-Patchou

7 s/ Robert Flenbaugh II

8 s/ Cynthia B. Jones

9 Attorneys for Mr. Kamdem

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of May 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to attorney of record for the Plaintiff, co-defendants and all other parties.

s/ Neil M. Fox
Attorney for Ms. Fanyo-Patchou